

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

LYNNE FREEMAN,

Plaintiff,

vs.

TRACY DEEBE-ELKENANEY P/K/A
TRACY WOLFF, et al.,

Defendants.

Case No.: 1:22-cv-02435-LLS-SN

**PROSPECT DEFENDANTS' NOTICE OF MOTION FOR SUMMARY
JUDGMENT ON PLAINTIFF'S STATE LAW CLAIMS**

PLEASE TAKE NOTICE THAT, Defendants Emily Sylvan Kim and Prospect Agency, LLC, (collectively, the "Prospect Defendants"), through their respective undersigned counsel, upon the accompanying (i) Memorandum of Law in Support of Prospect Defendants' Motion for Summary Judgment on Plaintiff's State Law Claims; (ii) Defendants' Consolidated Local Rule 56.1 Statement of Material Facts; (iii) Declaration of Lacy H. Koonce, III dated December 22, 2023 and the exhibits annexed thereto; and (iv) Declaration of Emily Sylvan Kim dated December 22, 2023, hereby move this Court at the United States District Court for the Southern District of New York, 40 Foley Square, Courtroom 430, New York, New York 10007, before the Honorable Sarah Netburn, on a date and time to be designated by the Court, for an order: (1) granting summary judgment in favor of the Prospect Defendants on Plaintiff's state law claims pursuant to Fed. R. Civ. P. 56 and (2) granting such other order and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's October 11, 2023 Order (ECF No. 269), Plaintiff's opposition must be served by January 31, 2024 and the Prospect Defendants' reply must be served by February 21, 2024.

Dated: New York, New York
December 22, 2023

Respectfully submitted,

KLARIS LAW PLLC

By: /s/ Lacy H. Koonce, III
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*Attorneys for Defendant Tracy Deebs-
Elkenaney p/k/a Tracy Wolff*

CERTIFICATE OF SERVICE

I, Lacy H. Koonce, III, hereby certify that a true and correct complete copy of Prospect Defendants' Notice of Motion for Summary Judgment on Plaintiff's State Law Claims and all documents and exhibits annexed thereto has been served on all counsel of record via the Court's CM/ECF service.

/s/ Lacy H. Koonce, III
Lacy H. Koonce, III